

Technical Advisory Committee

Elizabeth River PCB TMDL

May 11, 2011

Mark Richards (DEQ)

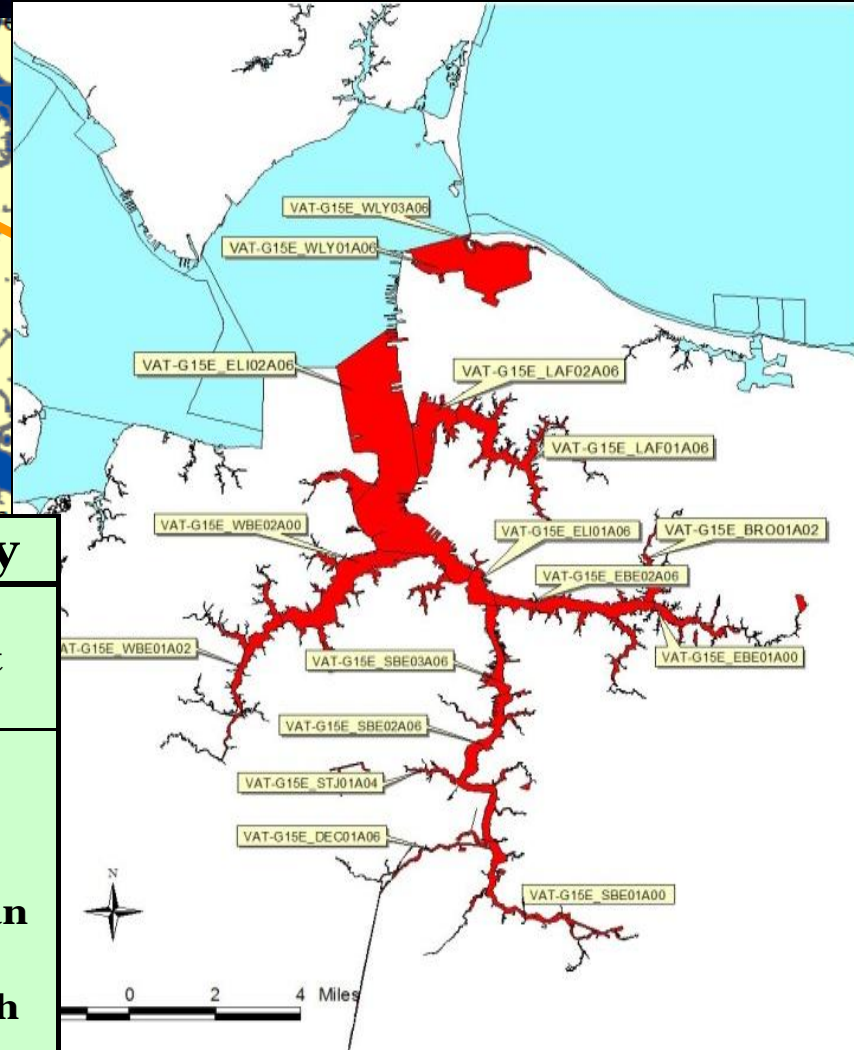
Mark.richards@deq.virginia.gov



Purpose of TAC

- Provides an opportunity for DEQ & VIMS to:
 - Inform interested stakeholders on TMDL progress
 - Address comments (VSRA)
- TAC Role
 - Assist in solving technically challenging problems
 - Address specific topics i.e., form Work Groups if necessary
 - MS4, other (?)

Tidal James River PCB Impairment



Fish Species

Advisory

Gizzard Shad, Carp, Blue Catfish & Flathead Catfish \geq 32 inches

Do Not Eat

Blue Catfish & Flathead Catfish < 32 inches, Channel Catfish, White Catfish, Largemouth Bass, Bluegill Sunfish, **American Eel**, Quilback Carpsucker, Smallmouth Bass, Creek Chub, Yellow Bullhead Catfish, **White Perch, Blueback Herring, Striped Bass, Hickory Shad, Croaker, Spot, Bluefish**

**No more than
two
meals/month**



PCBs – A Legacy or On-going Issue?

- PCBs used many years after banned (1990's)
- Dielectric oils considered non PCB < 50 ppm
 - Fish advisories at 0.05 ppm
- Inadvertent production
 - Carbon + heat + chlorine
 - Up to 50 ppm allowed (TSCA)
- Contaminated sites with active transport (non-point - e.g., CERCLA, RCRA, VRP, unknown)
- Atmosphere (off-gas from contaminated sites)
- Point Sources



PCB Exposure Pathways (fish)

- Intake through gills from water column (BCF)
 - Basis of existing WQC (1980 EPA guidelines)
- Ingestion of contaminated sediment
 - Indirect uptake from foraging
- Exposure through skin from contaminated sediment (e.g. catfish)
- Ingestion of prey
 - Biomagnification



VA Regulatory Criteria

Consumption Advisories Fish Tissue (ppb)	Water Quality Criterion (WQC) Total PCBs (ppb)
VDH 50	
DEQ (screening) 20	0.00064

Criterion represents target concentration in the water column that minimizes the bioaccumulation of tPCBs in fish to protect human consumption



TMDL Development/Source Assessment

Components of TMDL Study

Fish Consumption Advisory



Identify Problem

On-going



Source Assessment

- Identify sources
- Estimate source loading

Method 1668
Low Level PCB
Analysis



Link Sources to Targets

- Assess linkages
- Estimate total loading capacity

PCB Model



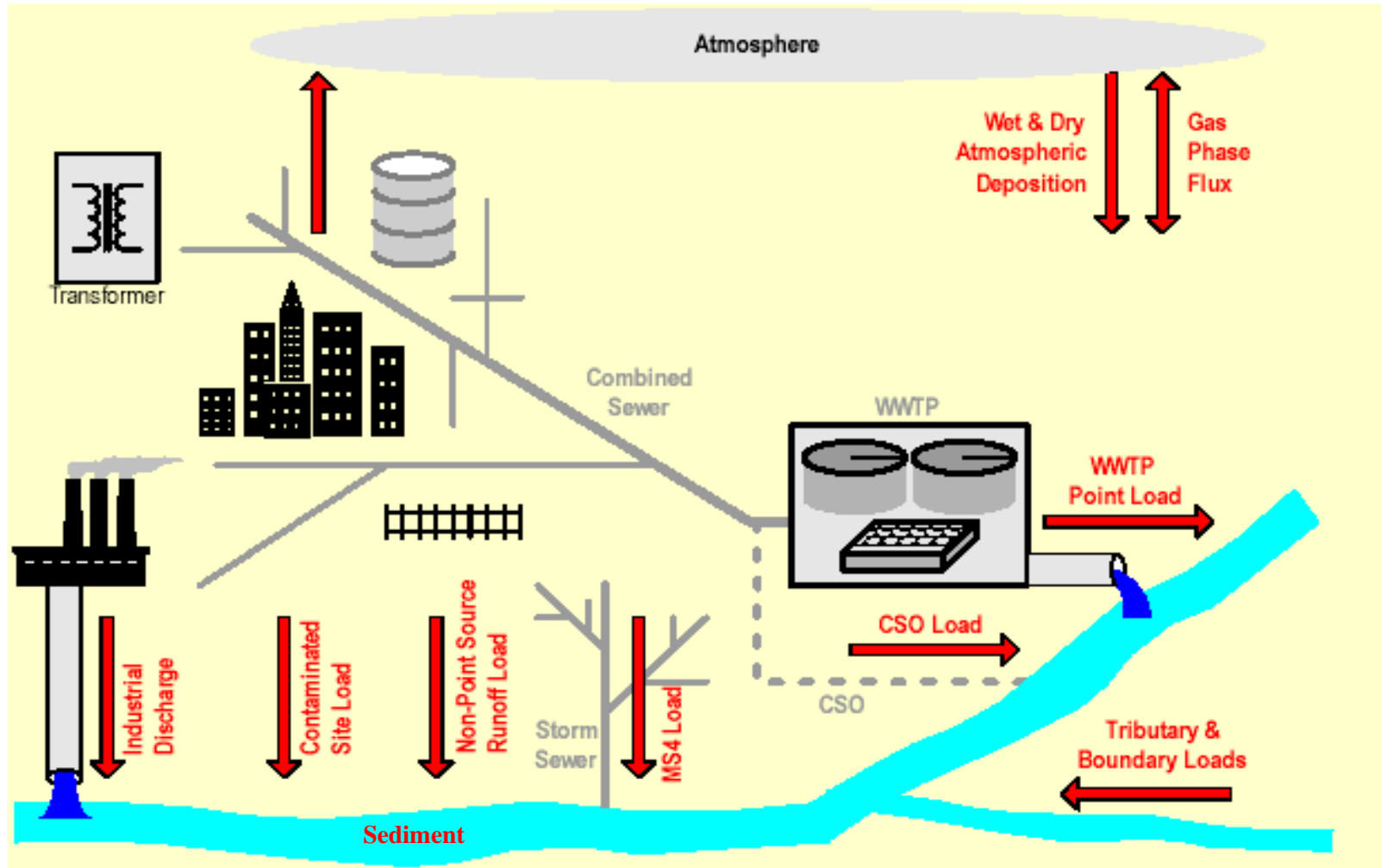
TMDL Allocations

- Divide loads among sources (WLA and LA)

$$\text{WLA} + \text{LA} + \text{MOS} = \text{TMDL}$$



External Sources of PCBs



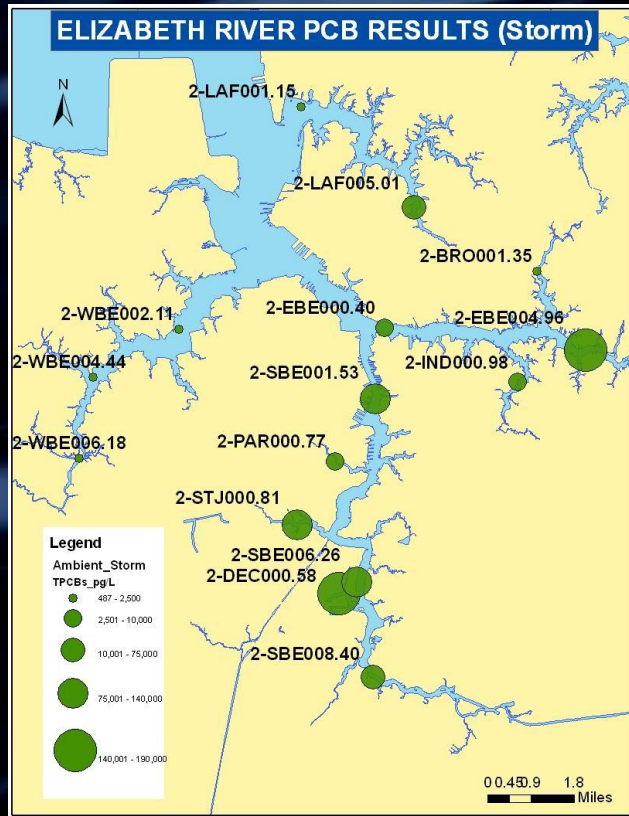
PCB Loading calculated from each category

TMDL Source Assessment Studies

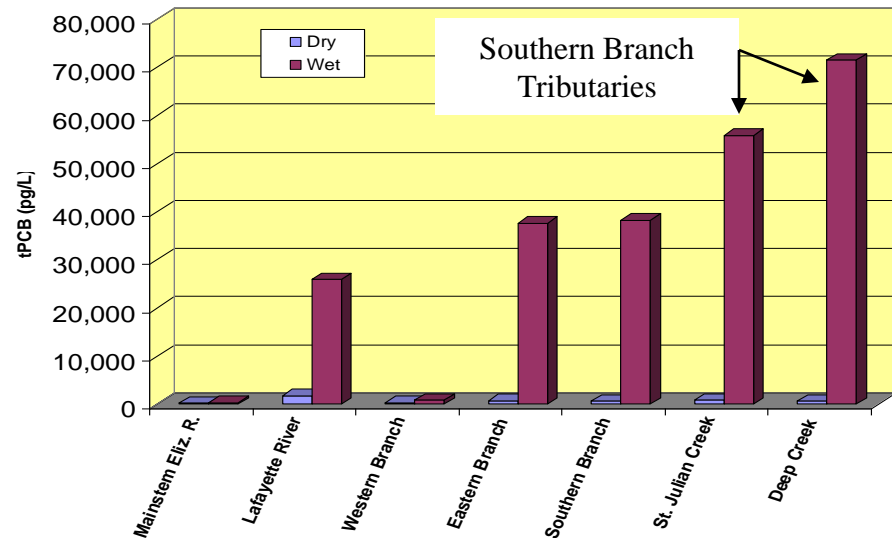
- Ambient water PCB results necessary to develop TMDLs
 - Source identification
 - Assist in the development of site specific PCB endpoints if appropriate (BAF)
 - Fate & Transport model calibration/validation



Total PCB Water Results



Mean Total PCB Concentration in Water Samples Collected During Dry Conditions and Wet (Storm) Conditions (2009 & 2010)



Water Quality Criterion = 640 pg/L



Source Assessment

Atmospheric Deposition

- Literature based PCB values
 - Serve as default values if other information not available
 - Regional data (Ches. Bay area) from mid '90's or earlier (represent current condition??)
- DEQ designing Air Deposition Study
 - Investigate different landuses
 - Recent studies * show significant gradients (reduction by factor 10) at a distance of 5km

Source Assessment

Contaminated Sites

- Compile soil data (when available)
 - Remediated site
 - Use clean-up level as PCB concentration
 - Non-remediated site
 - Use median soil concentration
- Apply model
 - Universal Soil Loss Equation (USLE) or similar
 - Derive existing load

Source Assessment

Point Sources

- Point Source PCB results necessary for TMDL development
 - Municipal, Industrial, MS4
 - Baseline load development
- EPA Method 608 (Permit method)
 - PCBs rarely detected ($\text{MDL} = 0.065 \mu\text{g/L}$; $\text{QL} = 0.5 \mu\text{g/L}$)
 - Reported as Aroclors
 - Assumes original congener formulation retained

$\text{tPCB WQC} = 0.00064 \mu\text{g/L}$



Source Assessment

Point Sources (cont.)

- Develop TMDL Baseline Load
 - No data \neq no load
 - Use assumptions (Method DL, QL, or $\frac{1}{2}$ of DL, QL as default)
 - Generate low level PCB data
 - Relevant to fish impairments

Source Assessment

Point Sources (cont.)

- DEQ requested voluntary monitoring of point source outfalls
 - Informational meetings held:
 - Upper Tidal James - September 2009
 - Elizabeth River – November 2009
 - Middle & Lower Tidal James – October 2010
 - PCB Data requested by Sept. – Oct. 2011
 - Facilities selected in accordance with DEQ's PCB Guidance Document

<http://www.deq.virginia.gov/tmdl/pcb.html>



Source Assessment

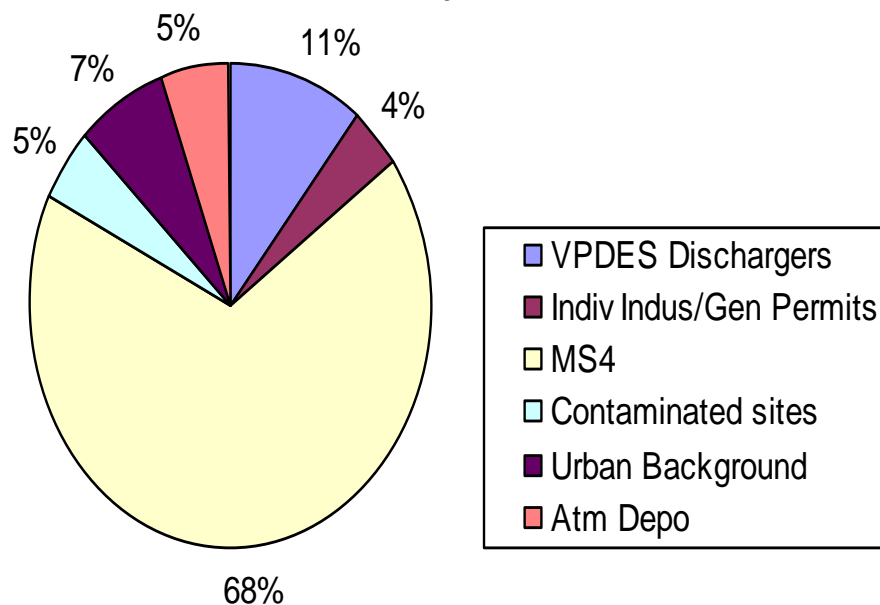
MS4s

- Preference to develop loads based on actual data (Method 1668)
 - Without data will estimate PCB loads
 - Apply Simple Method for calc. loads (or similar)
 - Landuse considered
- Internal dialogue (DEQ) on how to address PCB contamination
 - Exploring mechanisms to expedite PCB remediation (if/when necessary)

Upper Roanoke PCB TMDL

Completed 2009

Existing PCB Loadings in the Upper Roanoke River



Existing load = 162,914 mg/yr

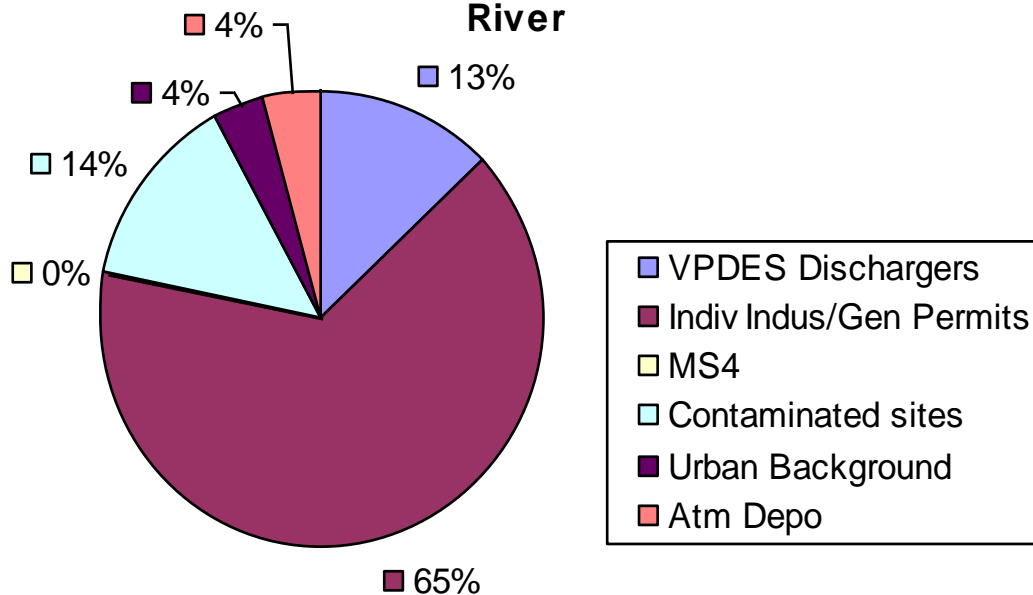
Source Category	% Reduction
VPDES Dischargers	-60
Indiv Indus/Gen Permits	99
MS4	99
Contaminated sites	100
Urban Background	99.4
Atm Depo	5
total	77

TMDL = 39,094 mg/yr

Lower Roanoke PCB TMDL

Completed 2009

Existing PCB Loadings in the Lower Roanoke River



Existing load = 596,842 mg/yr

Source Category	% Reduction
VPDES Dischargers	97.5
Indiv Indus/Gen Permits	100
MS4	99.3
Contaminated sites	100
Urban Background	99.4
Atm Depo	5
total	95.8

TMDL = 26,549 mg/yr

PCB Analysis

Investigative PCB Studies

- Historic Focus
 - Fish tissue and sediment sample collection/analysis
 - PCBs detected in water column during 1970's (ug/L)
 - Since 1980's difficult to detect in water matrix (conc. declined)
- Recent Focus
 - PCB data from water matrix (TMDL need)
 - Semi-permeable membrane devices (SPMD lipid bags)
 - Mimic fish (concentrates lipophilic toxins)
 - Improved PCB analytical methods
 - EPA Method 1668 – Detects PCBs in water (ultra-low concentration)
 - Important PCB TMDL development tool



PCB Analytical Methodology

- EPA Method 1668 (Version A 1999)
 - Current Version 1668C
- High Resolution Gas Chromatography / High Resolution Mass Spectrophotometer (HRGS/HRMS)
- Targets 209 PCB Congeners
 - Summed = tPCB (WQC)
- MDLs < 3 pg/L & QLs 5-20 pg/L on a congener basis
- 2 – 4 L water samples



PCB congener detection = 0.000003 µg/L



EPA PCB Method (1668)

- Analyzes 209 PCB congeners
 - PCB congener profiles deviate from original commercial mixtures (ERASC-003, 2003)
 - Accounts for weathering and biotransformation
 - Can facilitate source identification through “fingerprinting”



PCB Analytical Methodology

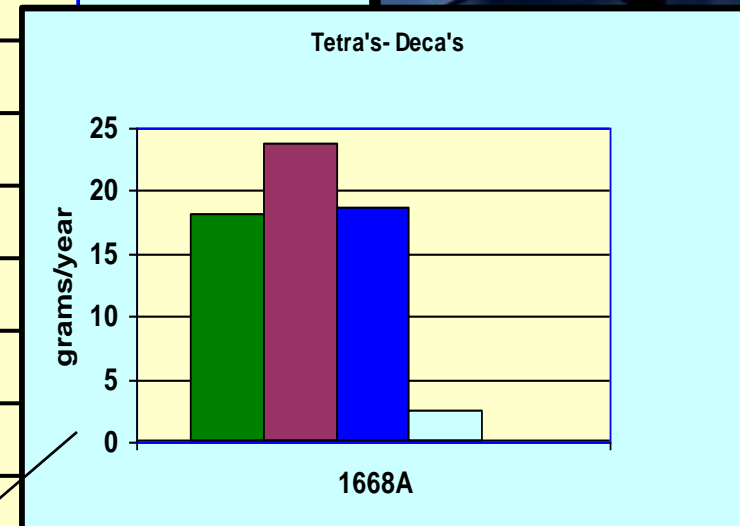
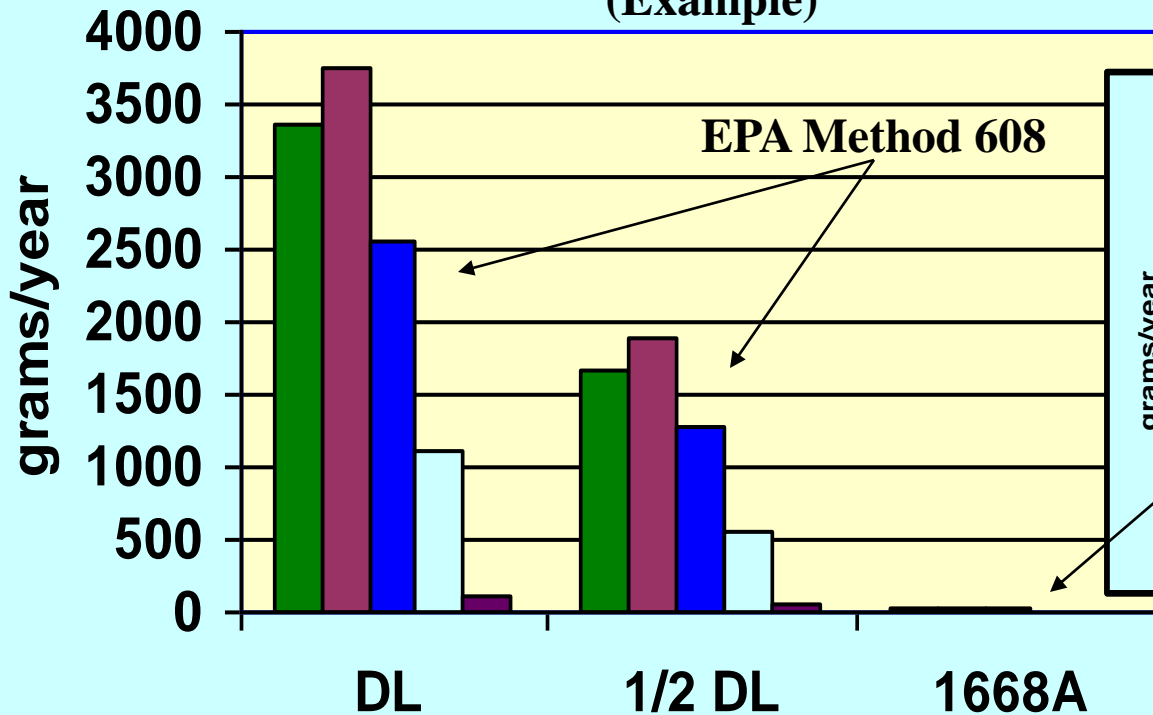
- Method 1668
 - Memorandum of Support from EPA (June 2007)
 - Contained in TMDL Guidance Memo No. 09-2001 (PCB Point Source Monitoring Guidance)
 - Referenced in EPA's Draft Guidance Document (April 2011)
 - Developing Total Maximum Daily Loads (TMDLs) for Waters impaired by Polychlorinated Biphenyls (PCBs)

PCB Interlaboratory Study

- Virginia Association of Municipal Wastewater Agencies (VAMWA) and Virginia Manufacturing Association (VMA)
 - Evaluated Method 1668
- DEQ has reviewed study and provided comments
- Responses provided by VAMWA & VMA
 - Currently under review by DEQ

Assumptions vs. Real Data

Projected PCB Loads from 5 major STPs on the
Potomac River
(Example)



Questions?



Presentations and Handouts Available at:
<http://www.deq.virginia.gov/tmdl>

DEQ PCB Website:
<http://www.deq.virginia.gov/tmdl/pcb.html>



Extra Slides

Point Sources

- TMDL requirements:
 - Baseline or existing load condition
 - Waste Load Allocations (WLAs)

$$\text{Baseline PCB Condition (g/yr)} = \left[\text{PCB conc. ng/L} \right] * \left[\text{Ave Flow (mgd)} \right] * \text{Conv. Factor}$$

~~~~~

$$\text{TMDL WLA (g/yr)} = \left[ \text{PCB Endpoint conc. conc. ng/L} \right] * \left[ \text{Design Flow (mgd)} \right] * \text{Conv. Factor}$$

# Potomac River PCB TMDL

## Completed 2007

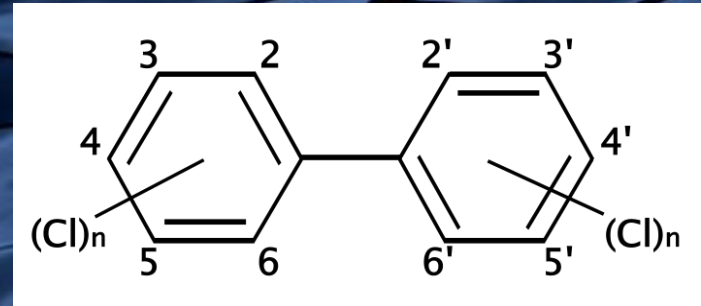
Total PCB loads to the tidal Potomac and Anacostia rivers, in g/year

| Source category                      | Baseline<br>(g/year) | TMDL<br>(g/year) | Reduction |
|--------------------------------------|----------------------|------------------|-----------|
| Potomac @ Chain Bridge <sup>1</sup>  | 16,433               | 329              | 98%       |
| Lower Basin Tributaries <sup>2</sup> | 2,857                | 407              | 86%       |
| Direct drainage <sup>3</sup>         | 10,996               | 413              | 96%       |
| WWTP <sup>4</sup>                    | 762                  | 68.2             | 91%       |
| CSO <sup>5</sup>                     | 3,020                | 61.2             | 98%       |
| Atmospheric deposition <sup>6</sup>  | 3,070                | 217              | 93%       |
| Contaminated sites <sup>7</sup>      | 15.1                 | 10.8             | 28%       |
| TOTAL <sup>8</sup>                   | 37,156               | 1,505            | 96%       |



# PCB Description and Use

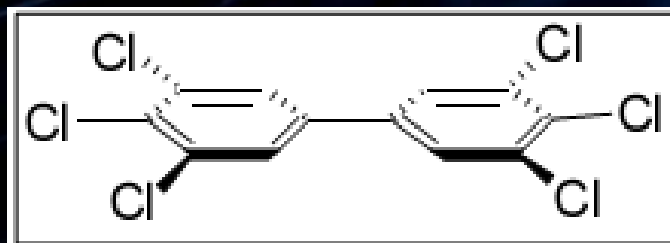
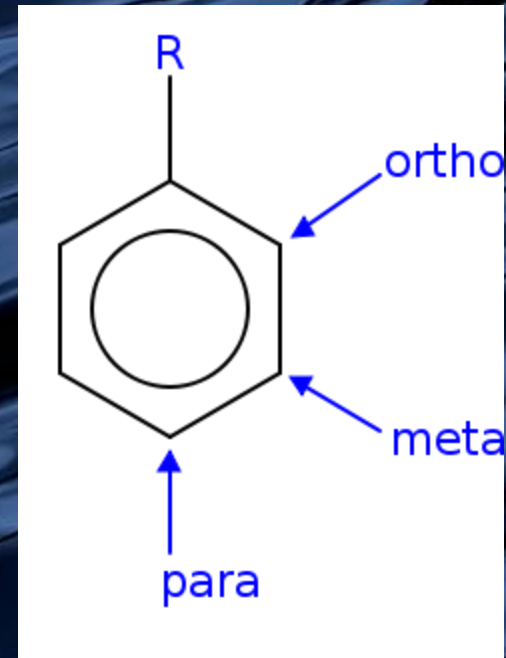
- Biphenyl ring structure with 1 to 10 chlorines
- 209 congeners
- Always present as a mixture
- Mixtures produced under trade name Aroclor (Monsanto)
  - Aroclor 1260
  - 12 – number of carbons
  - 60 – percent chlorine by weight
- Estimated that > 1.5 Billion lbs. manufactured in the U.S.



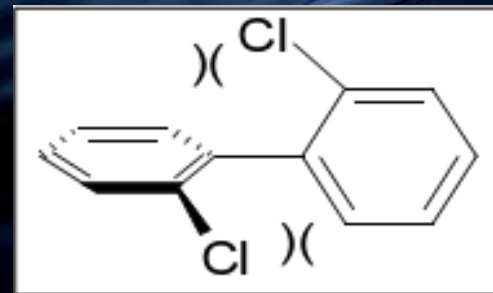
| PCB Homolog         | Cl's | Number of Congeners |
|---------------------|------|---------------------|
| Biphenyl            | 0    | 1                   |
| Monochlorobiphenyl  | 1    | 3                   |
| Dichlorobiphenyl    | 2    | 12                  |
| Trichlorobiphenyl   | 3    | 24                  |
| Tetrachlorobiphenyl | 4    | 42                  |
| Pentachlorobiphenyl | 5    | 46                  |
| Hexachlorobiphenyl  | 6    | 42                  |
| Heptachlorobiphenyl | 7    | 24                  |
| Octachlorobiphenyl  | 8    | 12                  |
| Nonachlorobiphenyl  | 9    | 3                   |
| Decachlorobiphenyl  | 10   | 1                   |

# PCB Description and Use

- Shape of the molecule depends on the location of the chlorine atom
- PCBs without Cl in the ortho position are “coplanar PCBs”
- Coplanar PCBs
  - Resemble dioxin
  - Often more toxic than non-coplanar PCBs



Coplanar PCB



Non-coplanar PCB



# PCB Description and Use

- World Health Organization (WHO)
  - Identified the 12 most toxic or “dioxin-like” PCB Congeners
    - PCB 126 & 169 ~ 100X less toxic than dioxin (TEF 0.01)
- Regulated by VADEQ as Total PCB (tPCB) = Sum 209 Congeners
  - Adhere to EPA guidelines

| PCB | Most Toxic |
|-----|------------|
| 77  |            |
| 81  |            |
| 105 |            |
| 114 |            |
| 118 |            |
| 123 |            |
| 126 | X          |
| 156 |            |
| 157 |            |
| 167 |            |
| 169 | X          |
| 189 |            |